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*Counsel for Individual and Representative  
 Plaintiffs and the Proposed Class*

*[additional counsel on signature page]*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

RICHARD KADREY, SARAH  
 SILVERMAN, CHRISTOPHER GOLDEN,  
 TA-NEHISI COATES, JUNOT DIAZ,  
 ANDREW SEAN GREER, DAVID HENRY  
 HWANG, MATTHEW KLAM, LAURA  
 LIPPMAN, RACHEL LOUSIE SNYDER,  
 JACQUELINE WOODSON, and LYSA  
 TERKEURST,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

Bryan L. Clobes (*pro hac vice*)  
 Alexander J. Sweatman (*pro hac vice*)  
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 & SPRENGEL LLP**  
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Consol. Case No. 3:23-cv-03417-VC

**STIPULATION AND [PROPOSED]  
 ORDER RE: CORRECTED SECOND  
 CONSOLIDATED AMENDED  
 COMPLAINT**

**Fed. R. Civ. P. 15(a)(2)**

1 Consolidated Plaintiffs Richard Kadrey, Sarah Silverman, Christopher Golden, Ta-Nehisi  
 2 Coates, Junot Díaz, Andrew Sean Greer, David Henry Hwang, Matthew Klam, Laura Lippman,  
 3 Rachel Louise Snyder, Jacqueline Woodson and Lysa TerKeurst (collectively, “Plaintiffs”) and  
 4 Defendant Meta Platforms, Inc. (“Meta”) (together with Plaintiffs, the “Parties”), by and through  
 5 their respective counsel of record, hereby stipulate as follows pursuant to Fed. R. Civ. P. 15(a)(2):

6 **WHEREAS**, Plaintiffs filed their Second Consolidated Amended Complaint on August  
 7 29, 2024 (“SCAC,” Dkt. 122 (public redacted); Dkt. 121-2 (sealed)); and

8 **WHEREAS**, on September 4, 2024, the parties met and conferred via video conference to  
 9 discuss certain proposed corrections to the SCAC, and were able to reach agreement;

10 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and among the Parties  
 11 pursuant to Fed. R. Civ. P. 15(a)(2), subject to the approval of the Court, that:

12 1. Within one (1) Court day of the Court’s approval of this stipulation, Plaintiffs will  
 13 file a corrected SCAC in the form attached hereto as **EXHIBIT A**.

14 2. The clerk will return the sealed version of the SCAC (Dkt. 121-2) to Plaintiffs, who  
 15 will promptly destroy it.

16 3. Meta’s obligation to answer the original SCAC (Dkt. 107) is vacated.

17 4. Within five (5) Court days of Plaintiffs’ filing the corrected SCAC, Meta will file  
 18 its answer and concurrently serve on Plaintiffs a true and correct redline showing all differences  
 19 between its answers to the FCAC and corrected SCAC. The answer to the corrected SCAC will  
 20 address new allegations in the corrected SCAC but otherwise remain substantively unchanged;

21 5. There will be no motion practice directed to the corrected SCAC or the answer to  
 22 the corrected SCAC pursuant to Fed. R. Civ. P. 12(b)(6), 12(e) or 12(f);

23 6. This stipulation and the timing of the filing of the corrected SCAC may not be used  
 24 by the parties to modify the existing case schedule.

25 7. Except as specifically provided herein, the Parties reserve all rights and defenses.

26 IT IS SO STIPULATED.

27 //  
 28 //

1 Dated: September 5, 2024

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*Attorneys for Defendant Meta Platforms, Inc.*

11 Dated: September 5, 2024

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20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

21 Dated: \_\_\_\_\_, 2024

22 \_\_\_\_\_  
23 Hon. Vince Chhabria

**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on September 5, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

/s/ David A. Straite  
David A. Straite